Mr. James Werbe Exide Corporation P.O. Box 2098 Muncie, Indiana 47302

Re: SMF 035-8502

First Significant Modification to FESOP F035-5386-00028

Dear Mr. Werbe:

Exide Corporation was issued a Federally Enforceable State Operating Permit (FESOP) on December 13, 1996, for a stationary lead smelting plant. A letter requesting a significant modification was received on April 24, 1997. Pursuant to the provisions of 326 IAC 2-8-11(d) the permit is hereby approved as described in the attached Technical Support Document.

The modification consists of changing various permit conditions in regards to an appeal by the source of the previously issued Federally Enforceable State Operating Permit (FESOP).

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act -IC 4-21.5-3-5. If you have any questions on this matter, please contact Cathie Moore, of my staff, at 317-233-2637 or 1-800-451-6027 (ext 3-2637).

Sincerely,

Paul Dubenetzky, Chief Permits Branch Office of Air Management

Attachments

cam

cc: File - Delaware County U.S. EPA, Region V

Delaware County Health Department Air Compliance Section - Jim Thorpe Compliance Data Section - Jerri Curless

Administration and Development Section - Janet Mobley

Technical Support and Modeling - Nancy Landau

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR MANAGEMENT

Exide Corporation 2601 West Mount Pleasant Boulevard Muncie, Indiana 47302

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the facilities listed in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 and contains the conditions and provisions specified in 326 IAC 2-8 and 40 CFR Part 70.6 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments) and IC 13-15 and IC 13-17 (prior to July 1, 1996, IC 13-1-1-4 and IC 13-7-10).

Operation Permit No.: F035-5386-00028	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: December 13, 1996

Significant Modification No.: SMF 035-8502	Pages Affected: 7-8, 11-12, 15-26, 28-31
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

Indiana Department of Environmental Management Office of Air Management

Technical Support Document for the Significant Modification to the Federally Enforceable State Operating Permit (FESOP) and Enhanced New Source Review (ENSR)

Source Name: Exide Corporation

Source Location: 2601 West Mount Pleasant Boulevard,

Muncie, Indiana 47302

County: Delaware SIC Code: 3341

Significant Modification No.: SMF035-8502-00028
Operation Permit No.: F035-5386-00028
Permit Reviewer: Cathie Moore

The Federally Enforceable State Operating Permit (FESOP) was issued on December 13, 1996. On April 24, 1997, Exide Corporation filed an Amendment requesting certain changes to the permit. The following changes were agreed to and made as the First Significant Modification for this source (strikeout added to show what was deleted and **bold** added to show what was added):

- 1. Condition B.10 "Compliance with Permit Conditions" has been changed to be as follows:
- B.10 <u>Compliance with Permit Conditions</u> [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]
 - (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance or modification; and
 - (3) Denial of a permit renewal application.
 - (b) **Except as provided in Condition B.14 "Emergency Provisions",** it shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- 2. Condition B.12 "Annual Compliance Certification" has been changed to be as follows:
- B.12 <u>Annual Compliance Certification</u> [326 IAC 2-8-5(a)(1)]
 - (a) The Permittee shall annually certify that the source has complied with the terms and conditions contained in this permit, including emission limitations, standards, and work practices. The certification shall be submitted July 1 to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015 and Exide CorporationFirst Significant Modification: SMF035-8502Page 2 of 9Muncie, IndianaAmended by: Cathie MooreOP No. F035-5386-00028

Permit Reviewer: Aida DeGuzman

U.S. Environmental Protection Agency (EPA), Region V Air and Radiation Division, Air Enforcement Branch (AE-17J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

- (b) This annual compliance certification report required by this permit shall be **considered** timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
 - (1) Delivered by U.S. mail and postmarked on or before the date it is due; or
 - (2) Delivered by any other method if it is received and stamped by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term and condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period; and
 - (5) Such other facts as IDEM, OAM, may require to determine the compliance status of the source.
- 3. Condition B.17 "Permit Renewal" has been changed to be as follows:
- B.17 Permit Renewal [326 IAC 2-8-3(h)]
 - (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include, at minimum, the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(20).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) The Permittee has a duty to submit a timely and complete permit renewal application. A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

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Amended by: Cathie Moore

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(B) Delivered by U. S. mail and postmarked on or before the date it is due;

If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due. [326 IAC 2-5-3]

- (C) Delivered by any other method if it is received and stamped by IDEM, OAM, on or before the date it is due.
- (2) If IDEM, OAM fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application of Renewal [326 IAC 2-8-9] If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as needed to process the application.
- 4. Condition B.25 "Annual Fee Payment" has been changed to be as follows:
- B.25 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]
 - (a) The Permittee shall pay annual fees to IDEM, OAM, consistent with the fee schedule established in 326 IAC 2-8-16.
 - (b) Failure to pay may result in administrative enforcement action, revocation of this permit, referral to the Office of Attorney General for collection, or other appropriate measures.
 - (c) The Permittee shall pay the annual fee within thirty (30) calendar days of receipt of a billing by IDEM, OAM or in a time period that is consistent with the payment schedule issued by IDEM, OAM.
 - (d) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before due date, the Permittee shall call the following telephone numbers: 1-800-451-6027 or 317-233-0179 (ask for OAM, Data Support Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.
- 5. Condition C.1 "Overall Source Limit" has been changed to be as follows:
- C.1 Overall Source Limit [326 IAC 2-8]

Pursuant to 326 IAC 2-8, emissions of any regulated pollutant from the entire source shall not exceed 99 tons per 365 days. Emissions of Hazardous air pollutants (HAPs) from the entire source shall not exceed 9 tons per 365 days for any individual HAP and 24 tons per 365 days for any combination of HAPs. Emissions shall include those from all emission points at the source including those that are insignificant as defined in 326 IAC 2-7(20).

Lead emissions from the source shall not exceed 4.0 tons per 365 days.

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The source shall be allowed to add insignificant activities not already listed in this permit, as long as the total emissions from the source do not exceed the above specified limits. In the event that any condition or combination of conditions in Section D of this permit differs from the above, the most restrictive limit will prevail.

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable;
 - (2) The potential to emit any individual Hazardous Air Pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period;
 - (3) The potential to emit any combination of Hazardous Air Pollutants (HAPs) from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period; and
 - (4) The potential to emit lead from the entire source shall be limited to less than five (5) tons per twelve (12) consecutive month period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.
- 6. Condition C.5 "Operation of Equipment" has been changed to be as follows:
- C.5 Operation of Equipment [326 IAC 2-8-5(a)(4)]
 - (a) All equipment that potentially might may emit pollutants into the ambient air shall be properly operated and maintained to meet the requirements of this permit and maintained in accordance with Section B Preventive Maintenance Plan.
 - (b) Unless otherwise stated in this permit, all air pollution control equipment listed in this permit shall be operated at all times that the emission unit(s) vented to the control equipment is in operation.
 - (c) The permittee shall perform all necessary maintenance according to the Preventive Maintenance Plan and make all necessary attempts to keep all air pollution control equipment in proper operating condition at all times such that the requirements of this permit are met.
- 7. Condition C.6 "Performance Testing" has been changed to be as follows:

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Muncie, Indiana Amended by: Cathie Moore

Permit Reviewer: Aida DeGuzman

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C.6 <u>Performance Testing</u>

That compliance stack tests shall be performed for PM, PM10, and lead for venturi scrubber, in the year 1998. Bin room baghouse shall be stack tested in the year 1999 for PM, PM10 and lead; refinery baghouse shall be stack tested in the year 1999 for lead; twin packed bed scrubber and ventilation baghouse shall be stack tested in the year 1999 for PM, PM10 and lead.

That compliance stack test for PM and PM10, and for Lead and THC in accordance with the applicable MACT standards, shall be performed before September 30, 2000 for the venturi scrubber, bin room baghouse, refinery baghouse, twin packed bed scrubber, and ventilation baghouse.

These tests shall be performed according to 326 IAC 3-2.1 3-6 (Source Sampling Procedures) using the methods specified in the rule or as approved by the Commissioner. The Office of Air Management (OAM) shall be notified of the actual test date at least two (2) weeks prior to the date, a test protocol shall be submitted to the OAM, Compliance Data Section, 35 days in advance of the test, and all test reports must be received by the OAM within 45 days of completion of the testing, pursuant to that rule.

- 8. Condition C.8 "Maintenance of Monitoring Equipment" has been changed to be as follows:
- C.8 <u>Maintenance of Monitoring Equipment</u> [326 IAC 1-6] [326 IAC IAC 2-8-4]

The Permittee shall perform all necessary maintenance and make all necessary attempts to keep all required monitoring equipment in proper operating condition at all times. In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.

The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. Preventive maintenance plans of the monitors shall be implemented. In addition prompt correction, as indicated, shall be initiated within the time frames specified, whenever the parameters monitored fall outside of the indicated values.

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons for the breakdown and of the efforts made to correct any problem. To the extent practicable, supplemental or intermittent monitoring for the parameter measured by such monitoring equipment should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring for the parameter should be implemented in accordance with the facility's operation and maintenance plan, until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain and operate all necessary monitors and related equipment in accordance with this permit and the applicable regulatory requirements. In addition, prompt corrective action in accordance with the facility's operation and maintenance plan shall be initiated as required by the plan.
- 9. Condition C.15 "General Reporting Requirements" has been changed to be as follows:

C.15 <u>General Reporting Requirements</u>

(a) Reports required in condition D.1.10 shall be submitted to:

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Indiana Department of Environmental Management, Compliance Data Section, Office of Air Management, 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
 - (1) Delivered by U.S. mail and postmarked on or before the date it is due; or
 - (2) Delivered by any other method if it is received and stamped by IDEM, OAM, on or before the date it is due.
- (c) All instances of deviations from any requirements of this permit must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

- (d) Any corrective actions taken as a result of an exceedance of a limit, an excursion from the parametric values, or a malfunction that may have caused excess emissions each deviation must be clearly identified in such reports.
- (e) The first report shall cover the period commencing the date of issuance of this permit and ending March 31, 1997.
- 10. The source requested to replace the existing venturi scrubber controlling the lead-batter crusher/breaker operation, identified as #1, with a new venturi scrubber. The new venturi scrubber has an increased air flow rate from 35,000 acfm to 40,000. The limits in Condition D.1.1 have been modified to account for the increase in air flow. Condition D.1.1 "Lead, Particulate Matter (PM), PM10, and Sulfur Dioxide (SO2)" has been changed to be as follows:
- D.1.1 Lead, Particulate Matter (PM), PM10, and Sulfur Dioxide (SO2)
 - (a) The lead (Pb) throughput to the battery breaking/crushing operation shall not exceed 126,000 tons of scrap metal per 365 day 12 month total rolled on a daily monthly basis.

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Muncie, Indiana Permit Reviewer: Aida DeGuzman

Exide Corporation

(b) The combined lead emissions from each control unit the twin packed bed sodium carbonate scrubber, ventilation baghouse, venturi scrubber, refinery baghouse, bin room baghouse and wood pallet shredder baghouse shall not exceed 1.14 pounds per hour (5.0 tons per year). be limited to less than the following:

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Venturi scrubber	- 0.00025 grain per dry
	standard cubic foot (gr/dscf)
Sodium carbonate packed tower scrubbers	- 0.00025 gr/dscf
Ventilation baghouse	- 0.00025 gr/dscf
Refinery baghouse	- 0.00025 gr/dscf
Bin room baghouse	- 0.00025 gr/dscf

These limits are equivalent to five (5) tons of lead per twelve (12) consecutive month period. Compliance with this condition will make 326 IAC 2-2, the Prevention of Significant Deterioration not applicable.

- (c) The metal produced from the reverberatory furnace shall not exceed 100,000 tons per 365 day 12 month total rolled on a daily monthly basis.
- (d) 1. Only a mixture of 70% to 100% by weight slag and 0% to 30% by weight lead bearing materials may be charged in the cupola.
 - 2. All other material shall be approved by the Office of Air Management prior to use. The resulting metal produced from the cupola shall not exceed 30,000 tons per 365 day 12 month total rolled on a daily monthly basis.

At no time shall the metal produced by both furnaces (cupola and reverberatory) exceed a combined total of 120,000 tons per 365 day **12 month** total rolled on a daily monthly basis.

(e) That combined particulate matter emissions from each control unit the twin packed bed sodium carbonate scrubber, ventilation baghouse, venturi scrubber, refinery baghouse, bin room baghouse and wood pallet shredder baghouse shall be limited as follows: not exceed 22.78 pounds per hour (99.8 tons per year). Compliance with this condition will make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable. Test data from these emission points, if collected in series, shall be aggregated as if the data has been collected simultaneously.

Venturi scrubber	- 0.006 grain per dry standard
	cubic foot (gr/dscf)
Sodium carbonate packed tower scrubbers	- 0.0059 gr/dscf
Ventilation baghouse	- 0.0059 gr/dscf
Refinery baghouse	- 0.0059 gr/dscf
Bin room baghouse	- 0.0059 gr/dscf
Wood pallet shredder baghouse	- 0.006 gr/dscf
Wood pallet shredder baghouse	

At no time shall emissions from either the twin packed bed sodium carbonate scrubber, or the ventilation baghouse exceed the 0.022 gr/dscf limit established by 326 IAC 12 (40 CFR 60, Subpart L).

Compliance with this condition and condition D.1.3 will make 326 IAC 2-2, the Prevention of Significant Deterioration not applicable, satisfy the requirements under 326 IAC 6-3, and the grain loading requirements under 326 IAC 12, 40 CFR 60, Subpart L.

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(f) The metal refined in the pot furnaces shall not exceed a combined total production of 120,000 tons per 12-month period 365 days **12 month** total rolled on a daily **monthly** basis.

- (g) That pursuant to 326 IAC 7-1.1, sulfur dioxide (SO2) emissions from the firing of coke fuel at the cupola shall not exceed 6.0 pounds per million Btu heat input. The CEM data will be used to determine compliance with the limit in this condition.
- (h) That SO2 emissions shall not exceed 542 pounds per day
- (i)(h) That all scrap metal processed through the battery breaking operation shall undergo the soda-ash/caustic soda neutralizing wash to reduce the generation of SO2 emissions by 85%.

This measure is calculated to remove 35,595 tons of sulfur per year from the metal before it is fired in the reverberatory furnace based on a limited yearly metal throughput of 126,000 tons.

With throughput restrictions, sulfur dioxide emissions will be restricted to 99 tons per 365 day 12 month total rolled on a daily monthly basis. Compliance with this condition will make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

11. Condition D.1.2 "Hazardous Air Pollutants" has been changed to be as follows:

D.1.2 Hazardous Air Pollutants

That the hazardous air pollutant emissions shall be limited as follows:

- (a) A single hazardous air pollutant (HAP) emissions shall not exceed 9 10 tons per 365 day 12 month total rolled on a daily monthly basis.
- (b) Any combination of HAPs emissions shall not exceed 24 **25** tons per 365 day **12 month** total rolled on a daily **monthly** basis.

Therefore, the requirements of 326 IAC 2-7 do not apply.

12. Condition D.1.3 "NESHAP" has been changed to be as follows:

D.1.3 NESHAP

The source will be subject to 40 CFR 63, Subpart X - National Emission Standards for Hazardous Air Pollutant from Secondary Lead Smelting. The Operation and Maintenance Plan and limit under this NESHAP that is more stringent than the limit set forth in this FESOP shall be superseded by this NESHAP. The Operation and Maintenance Plan required under § 63.545 of this rule shall be submitted to the OAM for review and approval.

13. Condition D.1.5 "Operating Parameters" has been changed to be as follows:

D.1.5 Operating Parameters

The Permittee shall take readings of the total static pressure drop across all baghouses, and scrubbers at least once per day as required by 40 CFR § 63.548 (daily) and its Preventive Maintenance Plan, when the rotary drier, reverberatory furnace, blast furnace, pot furnaces, lead pig casting, materials storage and slag crushing, and wood shredding are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop shall be maintained at the following ranges:

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a) Ventilation baghouse - 2 inches to 10 inches

- b) Venturi scrubber 10 inches to 25 inches
- c) Twin packed bed sodium carbonate scrubber 5 inches to 25 inches
- d) Bin room baghouse 2 inches to 10 inches
- e) Refinery baghouse 2 inches to 10 inches
- f) Process baghouse 2 inches to 10 inches

or a ranges determined during the most recent stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of this range for any one reading.

The instrument used for determining the pressure shall comply with condition C.10 Pressure Gauge Specifications, be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

14. Condition D.1.6 "Compliance Stack Tests" has been changed to be as follows:

D.1.6 Compliance Stack Tests

That compliance stack tests shall be performed for PM, PM10, and lead for venturi scrubber, in the year 1998. Bin room baghouse shall be stack tested in the year 1999 for PM, PM10 and lead; refinery baghouse shall be stack tested in the year 1999 for lead; twin packed bed scrubber and ventilation baghouse shall be stack tested in the year 1999 for PM, PM10 and lead.

That compliance stack tests for PM, PM10, and for Lead and THC in accordance with the applicable MACT standards, shall be performed before September 30, 2000 for the venturi scrubber, bin room baghouse, refinery baghouse, twin packed bed scrubber, and ventilation baghouse.

These tests shall be performed according to 326 IAC 3-2.1 3-6 (Source Sampling Procedures) using the methods specified in the rule or as approved by the Commissioner. The Office of Air Management (OAM) shall be notified of the actual test date at least two (2) weeks prior to the date, a test protocol shall be submitted to the OAM, Compliance Data Section, 35 days in advance of the test, and all test reports must be received by the OAM within 45 days of completion of the testing, pursuant to that rule.

15. The reporting forms at the end of the permit have been updated to the newest model version.

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Indiana Department of Environmental Management Permits Branch, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that the IDEM, OAM may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon written request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records directly to both the U.S. EPA and IDEM, OAM, along with a claim of confidentiality.

Such confidentiality claims shall meet the requirements of 40 CFR Part 2, Subpart B (when submitting to U.S. EPA) and 326 IAC 17 (when submitting to IDEM, OAM).

B.9 <u>Compliance Order Issuance</u> [326 IAC 2-8-5(b)]

IDEM, OAM may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

- B.10 <u>Compliance with Permit Conditions</u> [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]
 - (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) enforcement action;
 - (2) permit termination, revocation and reissuance or modification; and
 - (3) denial of a permit renewal application.
 - (b) Except as provided in Condition B.14 "Emergency Provisions", it shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- B.11 <u>Certification</u> [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(I)]

Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification and any other certification required under this permit shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

A responsible official is defined at 326 IAC 2-7-1(33).

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B.12 <u>Annual Compliance Certification</u> [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually certify that the source has complied with the terms and conditions contained in this permit, including emission limitations, standards, and work practices. The certification shall be submitted July 1 to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

and

U.S. Environmental Protection Agency (EPA), Region V Air and Radiation Division, Air Enforcement Branch (AE-17J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

- (b) This annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term and condition of this permit that is the basis of the certification:
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period; and
 - (5) Such other facts as IDEM, OAM, may require to determine the compliance status of the source.

B.13 <u>Preventive Maintenance Plan</u> [326 IAC 2-8-4(9)] [326 IAC 1-6-3]

- (a) The Permittee shall prepare, maintain and implement operation and Preventive Maintenance Plans as necessary including the following information on each:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

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B.15 <u>Deviations from Permit Requirements and/or Conditions</u> [326 IAC 2-8-4(3)(C)(ii)] Deviations from FESOP requirements, (for emergencies see Condition B.14 - Emergency Provision) the probable cause of such deviations, and any corrective actions or preventive measures taken shall be reported to:

Indiana Department of Environmental Management Compliance Branch, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

Written notification shall be submitted on the attached Deviation Occurrence Reporting Forms.

- B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8(a)] [326 IAC 2-8-8(b)] [326 IAC 2-8-8(c)]
 - (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]
 - (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 (prior to July 1, 1996, in IC 13-7-10-5) or if the commissioner determines any of the following:
 - (1) That it contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
 - (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practical. [326 IAC 2-8-8(b)]
 - (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]
- B.17 Permit Renewal [326 IAC 2-8-3(h)]
 - (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include, at minimum, the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(20).

 Request for renewal shall be submitted to:

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> Indiana Department of Environmental Management Permits Branch, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, IN 46206-6015

- Timely Submittal of Permit Renewal [326 IAC 2-8-3] (b)
 - (1) The Permittee has a duty to submit a timely and complete permit renewal application. A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

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- If the date postmarked on the envelope or certified mail receipt, or (B) affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM. OAM on or before the date it is due. [326 IAC 2-5-3]
- (2) If IDEM, OAM fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- Right to Operate After Application of Renewal [326 IAC 2-8-9] (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM takes final action on the renewal application, except that this protection shall cease to apply if. subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as needed to process the application.
- **B.18** Administrative Permit Amendment [326 IAC 2-8-10]
 - An administrative permit amendment is a FESOP revision that makes changes of the type specified under 326 IAC 2-8-10(a).
 - (b) An administrative permit amendment may be made by IDEM, OAM, consistent with the procedures specified under 326 IAC 2-8-10(b).
 - (c) The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- B.19 Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]
 - A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-8-10.

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subject to the constraints in section (a) of this condition and those in 326 IAC 2-8-15(c).

(d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7) and subject to the constraints in section (a) of this condition and those in 326 IAC 2-8-15(d).

B.23 Construction Permit Requirement [326 IAC 2-1]

Prior to <u>any</u> change in the operation which may result in an increase in allowable emissions exceeding those specified in 326 IAC 2-1-1 (Construction and Operating Permit Requirements), the change must be approved by the Office of Air Management (OAM).

B.24 <u>Inspection and Entry</u> [326 IAC 2-8-5(a)(2)]

Upon presentation of IDEM identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of demonstrating compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of demonstrating compliance with this permit or applicable requirements. [326 IAC 2-8-5(a)(4)]

B.25 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAM, consistent with the fee schedule established in 326 IAC 2-8-16.
- (b) Failure to pay may result in administrative enforcement action, revocation of this permit, referral to the Office of Attorney General for collection, or other appropriate measures.

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- (c) The Permittee shall pay the annual fee within thirty (30) calendar days of receipt of a billing by IDEM, OAM or in a time period that is consistent with the payment schedule issued by IDEM, OAM.
- (d) The applicable fee is due April 1 of each year.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable;
 - (2) The potential to emit any individual Hazardous Air Pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period;
 - (3) The potential to emit any combination of Hazardous Air Pollutants (HAPs) from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period; and
 - (4) The potential to emit lead from the entire source shall be limited to less than five (5) tons per twelve (12) consecutive month period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following:

- (a) Visible emissions shall not exceed an average of 40% opacity in 24 consecutive readings,
- (b) Visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

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C.3 Open Burning

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. This is not a federally enforceable condition.

C.4 **Fugitives Dust Emissions**

The Permittee shall be in violation of 326 IAC 6-4, if any of the criteria specified in 326 IAC 6-4-2 (1) through (4) are violated.

That a Fugitive Dust Control Plan covering processes and material handling fugitives, hooding and ventilation, and outside fugitive emissions sources, submitted on June 28, 1989 and amended on March 24, 1995, shall be implemented.

C.5 Operation of Equipment [326 IAC 2-8-5(a)(4)]

- All equipment that potentially may emit pollutants into the ambient air shall be properly (a) operated and maintained to meet the requirements of this permit and maintained in accordance with Section B - Preventive Maintenance Plan.
- (b) Unless otherwise stated in this permit, all air pollution control equipment listed in this permit shall be operated at all times that the emission unit(s) vented to the control equipment is in operation.
- The permittee shall perform all necessary maintenance according to the Preventive (c) Maintenance Plan and make all necessary attempts to keep all air pollution control equipment in proper operating condition at all times such that the requirements of this permit are met.

Compliance Testing Requirements [326 IAC 2-8-4(3)]

C.6 Performance Testing

That compliance stack test for PM and PM10 and for Lead and THC in accordance with the applicable MACT standards, shall be performed before September 30, 2000 for the venturi scrubber, bin room baghouse, refinery baghouse, twin packed bed scrubber, and ventilation baghouse.

These tests shall be performed according to 326 IAC 3-6 (Source Sampling Procedures) using the methods specified in the rule or as approved by the Commissioner. The Office of Air Management (OAM) shall be notified of the actual test date at least two (2) weeks prior to the date, a test protocol shall be submitted to the OAM, Compliance Data Section, 35 days in advance of the test, and all test reports must be received by the OAM within 45 days of completion of the testing, pursuant to that rule.

Compliance Monitoring [326 IAC 2-8-5(a)(1)]

C.7 Compliance Monitoring [326 IAC 2-8-4(3)]

Compliance with applicable requirements shall be documented in accordance with the provisions of 326 IAC 2-8-4(3). The Permittee shall be responsible for installing any equipment and initiating any monitoring no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

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in writing, with full justification of the reasons for inability to meet this date and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(C)(33).

C.8 Maintenance of Monitoring Equipment [326 IAC IAC 2-8-4]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons for the breakdown and of the efforts made to correct any problem. To the extent practicable, supplemental or intermittent monitoring for the parameter measured by such monitoring equipment should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring for the parameter should be implemented in accordance with the facility's operation and maintenance plan, until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain and operate all necessary monitors and related equipment in accordance with this permit and the applicable regulatory requirements. In addition, prompt corrective action in accordance with the facility's operation and maintenance plan shall be initiated as required by the plan.

C.9 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the requirements of this permit shall be performed, whenever applicable according to the provisions of 326 IAC 3, or 40 CFR Part 60, Appendix A, as appropriate, unless some other method is specified in this permit.

C.10 Pressure Gauge Specifications

Whenever a condition in this permit requires the taking of pressure drop across any part of the unit or its control device the gauge employed shall have a scale such that the expected normal reading shall be no less than 20 percent of full scale and be accurate within ±2% of full scale reading. The instrument shall be quality assured and maintained as specified by the vendor.

Corrective Actions [326 IAC 2-8-4(1)] [326 IAC 2-8-5(1)]

C.11 Failure to Take Corrective Action

For each unit for which parametric monitoring is required, appropriate corrective actions as described in the Preventive Maintenance Plan shall be taken when indicated by monitoring information. Failure to take corrective action following an excursion of a surrogate monitoring parameter within the indicated time may constitute a violation of the permit unless taking corrective action set forth in the Plan would be unreasonable.

After investigating the reason for the excursion, the permittee may be excused from taking further corrective action for any of the following reasons:

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(a) Providing that prompt action was taken to correct the monitoring equipment, that the monitoring equipment malfunctioned, giving a false reading; or

- (b) The permittee has determined that the parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or
- (c) An automatic measurement was taken when the process was not operating; or
- (d) The permittee determines that the process has already returned to operating within "normal" parameters and no corrective action is required.

Records shall be kept of all instances in which the action values were not met and of all corrective actions taken, and reasons for not taking corrective actions. In the event of an "emergency" as defined in 326 IAC 2-8-12 the provisions of that rule requiring prompt corrective action to mitigate emissions shall prevail.

C.12 Actions Related to Noncompliance Demonstrated by a Stack Test

Whenever the results of the stack test performed in conformance with Condition C.6-Performance Testing, of this permit exceed the level specified in any condition of this permit, appropriate corrective actions shall be submitted to IDEM-OAM within 30 (thirty) days of Permittee's receipt of the test results. These actions shall be implemented immediately unless notified by OAM that they are not acceptable. The Permittee shall minimize emissions while the corrective actions are being implemented.

Should IDEM, OAM request a second test to demonstrate compliance it shall be performed within 120 days of the request. Failure of the second test to demonstrate compliance may be grounds for immediate revocation of the permit to operate the affected facility.

Record Keeping and Reporting [326 IAC 2-8-4(3)]

C.13 Monitoring Data Availability

All observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions. Records shall be kept of the times that the equipment is not operating. If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality. If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded. At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed 5% of the operating time in any quarter. Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason.

C.14 General Record Keeping Requirements

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location and available within one hour upon verbal request of an IDEM, OAM representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two years providing they are made available within thirty (30) days after written request.

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- (b) Records of required monitoring information shall include:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include:
 - (1) Copies of all reports required by this permit.;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) All preventive maintenance and corrective actions that were implemented. Such records shall briefly describe what was done and indicate who did it;
 - (5) Relevant work purchases orders;
 - (6) Quality assurance and quality control procedures;
 - (7) Operator's standard operating procedures;
 - (8) Manufacturer's specifications or their equivalent; and
 - (9) Equipment "troubleshooting" guidance.

C.15 General Reporting Requirements

(a) Reports required in condition D.1.10 shall be submitted to:

Indiana Department of Environmental Management, Compliance Data Section, Office of Air Management, 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.

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(c) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) An emergency as defined in 326 IAC 2-7-1(12); or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

- (d) Any corrective actions taken as a result of each deviation must be clearly identified in such reports.
- (e) The first report shall cover the period commencing the date of issuance of this permit and ending March 31, 1997.

SECTION D.1 FACILITY OPERATION CONDITIONS

One (1) lead-battery crusher/breaker ID #1, which is rated at 126,000 tons of scrap metal per year, with Particulate Matter (PM) emissions controlled by venturi scrubber;

A soda-ash/caustic soda neutralizing wash to neutralize sulfuric acid in the scrap metal before it is smelted;

Two (2) soda ash silos (#2a & #2b), each with a dimension of 12.5' x 35', which is capable of storing 6,388.9 tons per year, and are controlled by fabric filter control;

One (1) 6.0 million Btu per hour (mmBtu/hr) natural gas-fired rotary drier ID #3, which is controlled by process baghouse, and followed by a twin packed scrubber;

A 24.3 mmBtu/hr lead reverberatory furnace ID #4, which is rated at 100,000 tons of lead per year, and is controlled by process baghouse, and followed by a twin packed sodium carbonate scrubbers;

A blast furnace (cupola) ID #5, which is rated at 30,000 tons of metal per year, is controlled by process baghouse, and followed by a twin packed sodium carbonate scrubbers;

Reverberatory and blast furnaces charge points, controlled by ventilation baghouse;

Two (2) lead pig casting machines, which are rated at 120,000 tons of lead per year;

Twelve (12) natural gas-fired pot furnaces (6K1-12), all controlled by refinery baghouse:

3 each 125 ton (3.5 mmBtu/hr),

3 each 100 ton (3.5 mmBtu/hr),

4 each 100 ton (3.1 mmBtu/hr, and

2 each 50 ton (3.1 mmBtu/hr);

Material handling which is controlled by bin room baghouse;

A feed mixture of 70% to 100% by weight slag and 0% to 30% by weight lead - bearing materials will be charged to the blast furnace.

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Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Lead, Particulate Matter (PM), PM10, and Sulfur Dioxide (SO2)

- (a) The lead (Pb) throughput to the battery breaking/crushing operation shall not exceed 126,000 tons of scrap metal per 12 month total rolled on a monthly basis.
- (b) The combined lead emissions from the twin packed bed sodium carbonate scrubber. ventilation baghouse, venturi scrubber, refinery baghouse, bin room baghouse and wood pallet shredder baghouse shall not exceed 1.14 pounds per hour (5.0 tons per year). These limits are equivalent to five (5) tons of lead per twelve (12) consecutive month period. Compliance with this condition will make 326 IAC 2-2, the Prevention of Significant Deterioration not applicable.
- The metal produced from the reverberatory furnace shall not exceed 100,000 tons per (c) 12 month total rolled on a monthly basis.
- Only a mixture of 70% to 100% by weight slag and 0% to 30% by weight lead (d) 1. bearing materials may be charged in the cupola.
 - 2. All other material shall be approved by the Office of Air Management prior to use. The resulting metal produced from the cupola shall not exceed 30,000 tons per 12 month total rolled on a monthly basis.

At no time shall the metal produced by both furnaces (cupola and reverberatory) exceed a combined total of 120,000 tons per 12 month total rolled on a monthly basis.

- (e) That combined particulate matter emissions from the twin packed bed sodium carbonate scrubber, ventilation baghouse, venturi scrubber, refinery baghouse, bin room baghouse and wood pallet shredder baghouse shall not exceed 22.78 pounds per hour (99.8 tons per year). Compliance with this condition will make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable. Test data from these emission points, if collected in series, shall be aggregated as if the data has been collected simultaneously.
- The metal refined in the pot furnaces shall not exceed a combined total production of (f) 120,000 tons per 12-month period 12 month total rolled on a monthly basis.
- That pursuant to 326 IAC 7-1.1, sulfur dioxide (SO2) emissions from the firing of coke (g) fuel at the cupola shall not exceed 6.0 pounds per million Btu heat input. The CEM data will be used to determine compliance with the limit in this condition.
- That all scrap metal processed through the battery breaking operation shall undergo the (h) soda-ash/caustic soda neutralizing wash to reduce the generation of SO2 emissions by

This measure is calculated to remove 35,595 tons of sulfur per year from the metal before it is fired in the reverberatory furnace based on a limited yearly metal throughput of 126,000 tons.

With throughput restrictions, sulfur dioxide emissions will be restricted to 99 tons per 12 month total rolled on a monthly basis. Compliance with this condition will make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

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Hazardous Air Pollutants

That the hazardous air pollutant emissions shall be limited as follows:

(a) A single hazardous air pollutant (HAP) emissions shall not exceed 10 tons per 12 month total rolled on a monthly basis.

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(b) Any combination of HAPs emissions shall not exceed 25 tons per 12 month total rolled on a monthly basis.

Therefore, the requirements of 326 IAC 2-7 do not apply.

D.1.3 **NESHAP**

The source will be subject to 40 CFR 63, Subpart X - National Emission Standards for Hazardous Air Pollutant from Secondary Lead Smelting. The Operation and Maintenance Plan required under § 63.545 of this rule shall be submitted to the OAM for review and approval.

D.1.4 Daily Visible Emissions Notations

- Daily visible emission notations of the bin room baghouse, refinery baghouse, twin packed bed scrubber, venturi scrubber, ventilation baghouse, and pallet shredder baghouse stack exhausts shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, 80% of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.
- 2. That pursuant to 326 IAC 12-1 (40 CFR Part 60.120 through Part 60.123. Subpart L-Standards of Performance for Secondary Lead Smelters, the following facilities shall be limited as follows:
 - a) Visible emissions from the reverberatory furnace and cupola shall be limited to 20% opacity.
 - b) Visible emissions from the pot furnaces shall be limited to 10% opacity.

Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)

D.1.5 **Operating Parameters**

The Permittee shall take readings of the total static pressure drop across all baghouses, and scrubbers as required by 40 CFR § 63.548 (daily) and its Preventive Maintenance Plan, when the rotary drier, reverberatory furnace, blast furnace, pot furnaces, lead pig casting, materials storage and slag crushing, and wood shredding are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop shall be maintained at the following ranges:

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a) Ventilation baghouse - 2 inches to 10 inches

- b) Venturi scrubber 10 inches to 25 inches
- c) Twin packed bed sodium carbonate scrubber 5 inches to 25 inches
- d) Bin room baghouse 2 inches to 10 inches
- e) Refinery baghouse 2 inches to 10 inches
- f) Process baghouse 2 inches to 10 inches

or a ranges determined during the most recent stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of this range for any one reading.

The instrument used for determining the pressure shall comply with condition C.10 Pressure Gauge Specifications, be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.1.6 Compliance Stack Tests

That compliance stack tests for PM, PM10, and for Lead and THC in accordance with the applicable MACT standards, shall be performed before September 30, 2000 for the venturi scrubber, bin room baghouse, refinery baghouse, twin packed bed scrubber, and ventilation baghouse.

These tests shall be performed according to 326 IAC 3-6 (Source Sampling Procedures) using the methods specified in the rule or as approved by the Commissioner. The Office of Air Management (OAM) shall be notified of the actual test date at least two (2) weeks prior to the date, a test protocol shall be submitted to the OAM, Compliance Data Section, 35 days in advance of the test, and all test reports must be received by the OAM within 45 days of completion of the testing, pursuant to that rule.

- D.1.7 That the Continuous Emission Monitors (CEM) for SO2 at each 45,000 cfm from the sodium carbonate packed tower scrubber stack shall be calibrated and operated according to 326 IAC 3-1.1. The CEM data will be used to determine compliance with 326 IAC 7 (Sulfur Dioxide Emission Limitations) and the limit in Condition D.1.1(h).
- D.1.8 Preventive Maintenance Plan [326 IAC 2-8-4(9)][326 IAC 1-6-3]

 A Preventive Maintenance Plan , in accordance with condition B.13 of this permit, is required for these facilities.

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Exide Corporation

Source Address: 2601 West Mount Pleasant Boulevard, Muncie, Indiana 47302

Mailing Address: P.O. Box 2098, Muncie, Indiana 47302

FESOP No.: F035-5386-00028

2001 11011 1 000 0000 00020		
This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.		
Please check what document is being certified:		
□ Annual Compliance Certification Letter		
□ Test Result (specify)		
□ Report (specify)		
□ Notification (specify)		
□ Other (specify)		
I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.		
Signature:		
Printed Name:		
Title/Position:		
Date:		

First Significant Modification: SMF035-8502 Amended by: Cathie Moore

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT

COMPLIANCE DATA SECTION P.O. Box 6015 100 North Senate Avenue Indianapolis, Indiana 46206-6015 Phone: 317-233-5674

Fax: 317-233-5967

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: **Exide Corporation** Source Address: 2601 West Mount Pleasant Boulevard, Muncie, Indiana 47302 Mailing Address: P.O. Box 2098, Muncie, Indiana 47302 FESOP No.: F035-5386-00028 This form consists of 2 pages Page 1 of 2 Check either No. 1 or No.2 This is an emergency as defined in 326 IAC 2-7-1(12) The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-☐ 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) The Permittee must submit notice in writing within ten (10) calendar days If any of the following are not applicable, mark N/A Facility/Equipment/Operation: Control Equipment: Permit Condition or Operation Limitation in Permit: Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

First Significant Modification: SMF035-8502 Amended by: Cathie Moore Page 31 of 31 OP No. F035-5386-00028

If any of the following are not applicable, mark N/A	Page 2 of 2
Date/Time Emergency/Deviation started:	
Date/Time Emergency/Deviation was corrected:	
Was the facility being properly operated at the time of the emergency/deviation? Yescribe:	/ N
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:	
Estimated amount of pollutant(s) emitted during emergency/deviation:	
Describe the steps taken to mitigate the problem:	
Describe the corrective actions/response steps taken:	
Describe the measures taken to minimize emissions:	
If applicable, describe the reasons why continued operation of the facilities are necess imminent injury to persons, severe damage to equipment, substantial loss of capital in loss of product or raw materials of substantial economic value:	
Form Completed by: Title / Position: Date: Phone:	

First Significant Modification: SMF035-8502 Amended by: Cathie Moore Page 31 of 31 OP No. F035-5386-00028

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

FESOP Quarterly Report

YEAR: _____

Source Name: Exide	Corporation
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Source Address: 2601 West Mount Pleasant Boulevard, Muncie, Indiana 47302

Mailing Address: P.O. Box 2098, Muncie, Indiana 47302

FESOP No.: F035-5386-00028
Facility: Secondary Lead Smelter

Parameter: Lead (Pb) and Sulfur Dioxide (SO₂)

Limit: Battery Breaking Operation - 126,000 tons per 12 month period rolled on a monthly basis

Reverberatory Furnace - 100,000 tons per 12 month period rolled on a monthly basis

Cupola - 30,000 tons per 12 month period rolled on a monthly basis

Reverb Furnace and Cupola (combined) - 120,000 tons per 12 month period rolled on a monthly basis

Pot Furnaces - 120,000 tons per 12 month period rolled on a monthly basis

% by weight Slag - 70% - 100%

Title / Position:

% by weight Lead Bearing Materials - 0% - 30%

Month: Throughput-Battery Breaking: (tons/month) (tons/12 months) Output-Reverberatory Furnace: (tons/month) (tons/12 months) Output-Cupola (tons/month) (tons/12 months) Output-Pot Furnaces: (tons/month) (tons/12 months) SO₂ Emissions: (lb/ton metal produced) (tons/month) (tons/12 months) Note: if SO2 emissions exceed 1.5 lb/ton of metal produced, CEM data must be supplied with this form. No deviation occurred in this quarter. Signature: Deviation/s occurred in this quarter. Deviation has been reported on: Date: Submitted by: Phone: